

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DAVID GONZALEZ,

Plaintiff,

—against—

BAM TRADING SERVICES, INC., d/b/a
BINANCE US, a Delaware corporation;

BINANCE HOLDINGS, LTD., d/b/a
BINANCE, a foreign company;

CHANGPENG ZHAO;

JOHN DOES 1-100 (fictitious names); and

XYZ CORP, INC. 1-100 (fictitious names),

Defendants.

Case No. 2:24-cv-08521-BRM-CLW

DECLARATION OF CHARLES MICHAEL

1. I am a partner with Steptoe LLP, counsel for Defendant Binance Holdings, Ltd (“BHL”). I submit this declaration in connection with the joint opposition of BHL and Defendant Changpeng Zhao to Plaintiff’s motion for a preliminary injunction.

2. Attached are true copies of the following exhibits:

Ex.	Document
1	Plea Agreement, <i>United States v. Binance Holdings Ltd.</i> , No. 2:23-cr-178 (W.D. Wash. Nov. 21, 2023), ECF 23
2	Agreement and Proxy Issued by Changpeng Zhao to BAM Management Company Limited, Nov. 21, 2023

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
September 13, 2024



Charles Michael